

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

In Re: Tiffany R. Shepherd ) Case No. 22-41224-13  
Debtor )

**RESPONSE TO TRUSTEE'S MOTION TO DENY CONFIRMATION OF PLAN**

**COMES NOW** the above-captioned Debtor, by and through Counsel, and for this Response to the Trustee's Motion to Deny Confirmation of Plan (the "Motion"), states that:

1. The only issue preventing confirmation of Debtor's Plan the Proof of Claim filed by the Kansas Department of Revenue asserting Debtor has not filed income taxes in the State of Kansas for the tax year of 2018.
2. Debtor has provided 2018 tax returns to her Counsel for Federal and the State of Missouri. Debtor is working with the State of Kansas to ascertain if she was required to file 2018 taxes in Kansas because she did not reside there, but her former employer remitted a W2 to the State of Kansas for 2018. Debtor will either need to file her 2018 Kansas State Tax Returns, or her former employer will need to file an amended W2 for 2018 in a different state.
3. Nothing in the Plan can be amended to address the tax issues noted above, and thus Debtor submits this Response to the Trustee's Motion and requests that it be denied.

**WHEREFORE**, Debtor prays the Court for an order denying the Trustee's Motion to Deny Confirmation of Debtor's Plan, instead enter an order confirming the Plan, and for such other relief as the Court deems equitable and proper.

Dated: January 31, 2023

Respectfully submitted,  
WM Law

/s/ Ryan M. Graham

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ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

I hereby certify that on January 31, 2023, the foregoing was delivered via e-mail to the parties listed below, and parties that are registered to receive electronic filings on ECF, and regular first class, postage prepaid to the parties listed below that are not registered to receive electronic filings on ECF.

Via the Court's ECF Notice System: Richard V. Fink, Standing Chapter 13 Trustee

Dated: January 31, 2023

/s/ Ryan M. Graham